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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 20-00249 RS
)	
Plaintiff,)	UNITED STATES' PROPOSED ADDITIONAL
)	VOIR DIRE QUESTIONS
v.)	
)	Dept.: Courtroom 3 – 17th Floor
)	Judge: Hon. Richard Seeborg
ROWLAND MARCUS ANDRADE)	
)	Trial Date: February 10, 2025
Defendant.)	
)	
)	

During the pretrial conference in this matter, the Court permitted the parties to file proposed voir dire questions. *Dkt. 492*. The United States respectfully submits the following proposed questions:

1. Do any of the jurors happen to know any of the other prospective jurors?
2. Would sitting as a juror in this case cause a significant financial hardship for you?
3. Much of the evidence in this trial will be in the form of documents, such as emails, text messages, and news articles. Witnesses will discuss those documents, and they will be

1 displayed on the screen in front of you. Is there anything that would make it difficult for you
2 to read and understand large amounts of text written in English?

3 4. Have you ever worked at a startup or in venture capital? If so, what was your role?

4 5. The U.S. Department of Justice, the FBI, and federal law enforcement in general have all
5 been in the news recently. Although this case is in San Francisco and results from a San
6 Francisco-based investigation, do you have such strong feelings about the Federal
7 Government that you would not be able to be fair in evaluating the evidence and witness
8 testimony in this case?

9 6. Have you or a close friend or family member had any prior experience with Jack Abramoff,
10 or strong opinions or feelings about him, that would influence your ability to be a fair and
11 impartial juror in this case?

12 7. In this case you may hear from witnesses who also committed crimes and who may be
13 seeking some leniency in their own cases for providing testimony or evidence in this case.
14 While the law provides for you to view those witnesses with scrutiny, would you tend to
15 ignore those witnesses because you don't believe that the law should allow such witnesses to
16 testify?

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18 DATED: January 24, 2025

Respectfully submitted,

19 ISMAIL J. RAMSEY
20 United States Attorney

21 /s/
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